

Application Number 10/714358
Response to Office Action dated 10/16/2007

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REMARKS

Applicants request the Examiner to enter the amendments and reconsider the application in view of the amendments. Applicants amend claims 1 and 19 and in doing so, Applicants have not added new matter; support in the originally filed specification for the amendments is given on page 17, lines 9-15. Claims 1-3, 19 and 30 are under active consideration.

The rejection under 35 U.S.C. §102(b)

Applicants traverse the rejection of claims 1-3, 19 and 30 as being anticipated by Hirano '368, using US 6961474B1 to refer to columns and lines. Hirano '368 does not teach or suggest "calculating the interval between the bit position corresponding to the current data selectively read out in the information register and the bit position corresponding to the last data selectively read out in the information register," as required by claims 1 and 19.

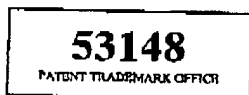
The rejection refers to Hirano '368 at column 20, lines 35-47 wherein Hirano '368 teaches that a data counter portion determines whether the data supplied by the bank memory is "0" (invalid coefficient). If the data is "0", it counts the number of consecutive "0s" until a valid coefficient (a coefficient other than "0") is supplied and writes a run length representing the number of consecutive "0s" and a valid coefficient, as a set of data, in the FIFOs alternately." Hirano '368, thus, explicitly states that the data counter portion counts the number of consecutive 0s. Applicants' invention does not count the number of consecutive zeros, rather Applicants claimed invention calculates an interval between the bit position corresponding to the current data selectively read out in the information register and the bit position corresponding to the last data selectively read out in the information register, *see* Figures 5 and 6 where the bit position corresponding to the current data selectively read is '17', then the interval between '17' and the bit position '2' corresponding to the last data that was read out is *a*. One of ordinary skill in the art can easily ascertain that the claimed invention does not count consecutive "0s", as taught by Hirano '368.

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Hirano '368 cannot render Applicants' invention as being obvious either. Hirano '368 discloses that means for counting the run-length is the same as that shown in the prior art of Figure 32 of Applicants' application wherein, if the quantized coefficient is 0, the number of quantized coefficients is counted by a run-length counter. Applicants, on the other hand, calculate the interval and this simplification achieves results that surpass the expectations of Hirano '368. See Applicants' specification at page 18, line 16 through page 19, line 6; discussing that the amount of time to access the data buffer is shortened by the amount of time that would have otherwise been required to read out data having a value of 0 so that the read time and processing time can be shortened, thus increasing the speed of the overall encoding process. Counting the run-length as taught by Hirano '368 is not necessary because the run-length encoding portion can compute the number of consecutive data having a value of 0 at the current bit position. Further, because only data determined by the comparing and determining portion to have a value of 1 is written to the data buffer, the amount of data that are written and transferred is reduced, allowing more efficient use of the data buffer. Thus, because the addresses associated with the intervals are stored, rather than every address, less hardware is required in the configuration.

Applicants request that the amendments be entered and that claims 1 and 19 be allowed. Claims 2-3 and 30 are at least allowable by virtue of their dependence upon independent claim 1. Applicants do not concede the correctness of the rejection.

Should there remain any other issues that could be resolved easily with a telephone conference, the Examiner is requested to telephone Mr. Douglas P. Mueller, Reg. No. 30300 at 612.455.3804.



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Respectfully submitted,

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